S. AMANDA MARSHALL, OSB #95347 United States Attorney District of Oregon **LEAH K. BOLSTAD, OSB #05203** Assistant United States Attorney **Leah.Bolstad@usdoj.gov** 1000 S.W. Third Ave., Suite 600 Portland, OR 97204-2902

Telephone: (503) 727-1000 Facsimile: (503) 717-1117

Attorneys for United States of America

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:12-CR-00107-02-BR

v.

## LATANISHA "TAY" BOOKER,

## GOVERNMENT'S MOTION FOR A REVISED PROTECTIVE ORDER

## Defendant.

The United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, through Assistant United States Attorney (AUSA) Leah K. Bolstad, moves

for a revised and more specific protective order as to defendant Booker. The Court previously

granted the government's unopposed motion for a protective order as to defendant Booker. (CR

 $22). \ \ On \ April \ 18$  , 2012, the Court authorized a more specific and narrowly-tailored protective

order as to co-defendant Wilmer. (CR 42). The government believes that the more narrowly-

tailored protective order entered as to co-defendant Wilmer adequately protects the victims and

their privacy, and hereby requests that the Court adopt the same protective order language as to defendant Booker.

The government has consulted with Amy Baggio, the attorney of record for defendant Booker, about this motion. Ms. Baggio has no objection to the Court entering a more specific protective order, consistent with the protective order applicable to co-defendant Wilmer.

Dated this 23<sup>rd</sup> day of April 2012.

Respectfully submitted,

S. AMANDA MARSHALL United States Attorney

<u>s| Leah K. Bolstad</u>

LEAH K. BOLSTAD, OSB #05203 Assistant United States Attorney (503) 727-1000